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Via Overnight Delivery

June 20, 2014

Ms. Catrice Williams, Secretary
Massachusetts Department of
Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: TNCI Operating Company LLC - Tariff Advice Letter No. 2

Dear Ms. Williams:

Enclosed for submission to the Massachusetts Department of Telecommunications and Cable ("Department") are an original, one three-hole punched, and four (4) copies of revised Sheets 2 and 42 for incorporation into TNCI Operating Company LLC's ("TNCI OpCo") switched exchange access telecommunications service tariff, Massachusetts D.T.C. Tariff No 3. A \$100.00 tariff filing fee is also enclosed.

This submission is made pursuant to the Federal Communications Commission's ("FCC") *Report and Order and Further Notice of Proposed Rulemaking*, in Docket Nos. WC Docket No. 10-90, *et al.*, FCC 11-161,¹ *Second Order on Reconsideration* in Docket Nos. WC Docket No. 10-90, *et al.*, FCC 12-47,² Sections 51.911 and 61.26(c)³ of the FCC's rules, 47 C.F.R. §§51.911, 61.26(c), and the Department's May 1, 2014 *Notice RE: 2014 Intercarrier Compensation Rate Reduction Tariff Filings* ("Notice").

With this submission, TNCI OpCo reduces its composite terminating switched exchange tandem access rate to equal the Company's direct access rate. TNCI OpCo's direct and tandem terminating switched access rates are below the Verizon Telephone Companies ("Verizon") composite terminating access rate, which includes FCC-ordered end office rate elements reductions, as set forth in Verizon's Tariff F.C.C. No. 11, Section 31 filed on June 16, 2014, and effective July 1, 2014.

¹ *Connect America Fund et al.*, WC Dkt. No. 10-90 *et al.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*), *pets. for review pending*, *Direct Commc'ns Cedar Valley, LLC v. FCC*, No. 11-9581 (10th Cir. filed Dec. 8, 2011) (and consolidated cases).

² *Id.*, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 12-47 (rel. April 25, 2014)

³ Pursuant to Section 61.26(c), "The benchmark rate for a CLEC's switched exchange access services will be the rate charged for similar services by the competing ILEC. If an ILEC to which a CLEC benchmarks its rates, pursuant to this section, lowers the rate to which a CLEC benchmarks, the CLEC must revise its rates to the lower level **within 15 days of the effective date of the lowered ILEC rate.**" [Emphasis supplied].

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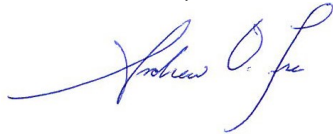
TNCI OpCo's toll VoIP-PSTN traffic rates comply with the above cited orders and rules and remain unchanged. A July 1, 2014 effective date is requested to enable the Company to comply with the above cited orders and rules. This amendment becomes effective on July 1, 2014. The Company's F.C.C. Tariff No. 1 may be viewed at <https://apps.fcc.gov/etfs/public/lecTariffs.action?idLec=611>.

An electronic copy of this submission has been submitted to the Department electronically as directed by the *Notice*.

Please acknowledge receipt of this filing by date-stamping and returning the additional copy of this transmittal letter in the self-addressed, postage-paid envelope provided for this purpose. Thank you for your attention to this matter. Questions may be directed to the undersigned at the above address, telephonically at 253.851.6700, or via electronic mail at aisar@millerisar.com.

Sincerely,

MILLER ISAR, INC.

A handwritten signature in blue ink, appearing to read "Andrew O. Isar", with a stylized flourish at the end.

Andrew O. Isar

Regulatory Consultants to
TNCI Operating Company LLC

Enclosures

CHECK SHEET

The sheets of this Tariff are effective as of the date shown. The Sheet revisions appearing below designate amendments from the original Tariff Sheet and are in effect on the date shown at the bottom of this Sheet. An asterisk appearing next to the revision indicates Sheets submitted with an amended filing.

<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>	<u>Sheet</u>	<u>Revision</u>
1	Original	30	Original				
2	First*	31	Original				
3	Original	32	Original				
4	Original	33	Original				
5	Original	34	Original				
6	Original	35	Original				
7	Original	36	Original				
8	Original	37	Original				
9	Original	38	Original				
10	Original	39	Original				
11	Original	40	Original				
12	Original	41	Original				
13	Original	42	First*				
14	Original						
15	Original						
16	Original						
17	Original						
18	Original						
19	Original						
20	Original						
21	Original						
22	Original						
23	Original						
24	Original						
25	Original						
26	Original						
27	Original						
28	Original						
29	Original						

Issued: June 23, 2014

Effective: July 1, 2014

Issued by:

Jeff Compton, President/CEO
114 E. Haley Street, Suite A
Santa Barbara, CA 93101

S RATES**4.1 ACCESS SERVICES**

4.1.1 Switched Exchange Direct Access

Originating, per access minute	\$0.003722
Terminating, per access minute	\$0.003722

4.1.2. Switched Exchange Tandem Access

Originating, per access minute	\$0.005250	
Terminating, per access minute	\$0.003722	(R)

4.1.3 Toll Free Database Access Service

Customer Identification Charge	
Per Query	\$0.004186
800 to POTS Number Translation	
Per Query	\$0.000000

4.2 MISCELLANEOUS SERVICES

4.2.1 Presubscription

Authorized PIC Change	
Per Telephone Exchange Service Line or Trunk, manual only	\$5.00

4.3 INDIVIDUAL CASE BASIS ARRANGEMENTS

Individual Case Basis ("ICB") arrangements will be developed on a case-by-case basis in response to a bona fide Customer or prospective Customer request and based on specific Customer commitments, unless otherwise prohibited by law or regulation. ICB arrangement switched exchange access service rates will be available to any similarly situated Customer.

4.4 VoIP-PSTN TRAFFIC

Originating, per access minute	\$0.003722	(T)
Terminating, per access minute	\$0.003722	(T)